

ADDITIONAL COMMENTS ON RECORD OF DECISION

Pg. 1, Para last	Delete reference to "any other nearby communities. . ."
Pg. 2, Para 3rd	Recycle at secondary lead smelter if possible and material is acceptable. (60% lead content is present minimum).
Pg. 1, Para II #3	Note that Taracorp was the only recipient of an AOC that actually complied with the Order. Tri-City Trucking and Stackorp were not recipients of the Special Notice Letter (122e).
Pg. 2, Para II #4	Date for placement on the NPL does not agree with the Draft Consent Decree.
Pg. 2, Para III	240 people out of 40,000 population does not represent "extensive community interest."
Pg. 4, Para #1	<u>Area 1</u> Trust 454 and Tri-City Trucking properties were recipients of EPA enforcement orders in 1984 to address sources of lead contamination. However, the requirements of the order were never fulfilled. Since these properties were identified as sources in the IEPA - SIP for lead in 1984, they should be included as PRP's in this action, as well as Stackorp.
Pg. 5, Para #2	<u>Surface Water and Air</u> St. Louis Lead Recyclers also ceased work on the Taracorp pile in 1983.
Pg. 5, Para	<u>Post RI Information and Inspections</u> The agency should provide information regarding additional areas identified.
Pg. 16, Para	<u>Short Term Effectives - Tables</u> The estimated time for completion of 2 1/2 years for Alternative H is, based upon OBG estimates, incorrect. Alternative H would require approximately 7 1/2 years to complete.



Pg. 16, Para

Cost

As noted above, Pg. 13, Para 2, the EPA acknowledged that cost estimates have not been developed for the 5 additional work areas, therefore this comparison is flawed by their own acknowledgment. Further, as identified by OBG during the public comment period, the EPA cost estimate for Alternative H was incorrect. (i.e., only counted on half of residences in response areas and had a mathematical error of approximately 30%).

Pg. 16, Para

Community Acceptance

A review of the synopsis of the public comments (attached to the ROD) failed to identify a public comment regarding the "construction of a clay liner" under the Taracorp pile expansion, or the contingency measure for soils disturbed in the future.